

I am commenting on the recent change to the TCPA that removes the "established business relationship" qualification from the fax regulations for commercial advertising solicitations. The Metals Service Center Institute is a trade association that offers numerous courses and materials to our members to increase their efficiency and productivity. Requiring a not-for-profit association to gather written permission from its members is an expensive and undue burden. Our solicitations are not "junk mail" but general business communications for services and materials that our members have asked us to provide. Faxes are the most economical means we can employ to inform our members of the dates and times of courses and the availability of our specific business materials. Please consider exempting associations and their communications with their members from the requirement of securing a signed approval before a fax with a commercial advertising solicitation is sent. We already have an established relationship with our members and this approval is an unnecessary hindrance to that relationship, especially for a nonprofit with a small staff.

Jonathan Kalkwarf